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Attorneys for Allstate Insurance Company,
solely as successor in interest to
Northbrook Excess & Surplus Insurance Company,
formerly Northbrook Insurance Company

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In Re:	Case No.: 21-30589
LTL MANAGEMENT LLC,	Chapter 11
Debtor.	Hon. Michael B. Kaplan
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LTL MANAGEMENT LLC,	Adv. Proc. No. 21-03032-MBK
Plaintiff,	Hearing Date: April 12, 2022 at 10:00 a.m.
v.	
THOSE PARTIES LISTED ON APPENDIX A TO COMPLAINT and JOHN AND JANE DOES 1-1000,	
Defendants.	

**ALLSTATE INSURANCE COMPANY, SOLELY AS SUCCESSOR IN INTEREST TO
NORTHBROOK EXCESS & SURPLUS INSURANCE COMPANY, FORMERLY
NORTHBROOK INSURANCE COMPANY'S, LIMITED JOINDER IN TRAVELERS'
COMPANY'S MOTION FOR AN ORDER ADDING TRAVELERS AS A MEDIATION
PARTY OR, IN THE ALTERNATIVE, MODIFYING THE MEDIATION PROTOCOL**

Allstate Insurance Company, solely as successor in interest to Northbrook Excess &
Surplus Insurance Company, formerly Northbrook Insurance Company ("Northbrook"), by and

through its undersigned counsel, hereby makes this limited joinder to Travelers' motion to be added as a Mediation Party or, in the alternative, modifying the Mediation Order (the "Travelers Motion," Dkt. No. 1900). As grounds for this joinder, Northbrook adopts and incorporates the alternative arguments set forth in the Travelers Motion as if set forth herein, and also state as follows:

1. Northbrook, along with Travelers and other insurers are parties to an insurance coverage action in New Jersey state court captioned *Atlanta Int'l Ins. Co., et al. v. Johnson & Johnson, et al.*, MID-L-3563-19 (Law Div.) ("Coverage Action"). The Coverage Action seeks declaratory relief resolving disputes arising from demands by Johnson & Johnson and Johnson & Johnson Consumer, Inc. ("Old JJCI," and collectively with Johnson & Johnson, "J&J") for insurance coverage for talc-related bodily injury claims.

2. Northbrook joins in Travelers' request that the Mediation Order be modified to remove any restrictions that would bar Debtor, Old JJCI, New JJCI, Middlesex or Johnson & Johnson from disclosing, to Northbrook and the other insurers, information related to, or exchanged in, the mediation in this bankruptcy case relating to possible settlement of the talc bodily injury claims against J&J or Debtor. No mediation order should preclude Johnson & Johnson and its affiliates from keeping its insurers abreast of developments concerning underlying claims for which the policyholder is seeking coverage. The Court should therefore modify the mediation order, as requested by Travelers, so that all insurers' rights under the insurance policies and state law are respected and preserved.

WHEREFORE, Northbrook request that the Court grant the alternative relief requested herein and in the Travelers' Motion.

Dated: April 7, 2022

Respectfully submitted,

/s/ Andrew K. Craig

Andrew K. Craig

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